REMARKS

This is in full and timely response to the non-final Office Action dated August 23, 2006. The present Amendment amends claims 1, 3, and 5 and cancels claims 2, 4, and 6 in order to further clarify a portion of the scope sought to be patented, and otherwise disputes certain findings of fact made in connection with the rejection of the claims. Claim 7 is also amended to correct minor matters of form. New dependent claims 8-13 have also been added. No new matter has been added. Accordingly, claims 1, 3, 5, 7, and 8-13 are presently pending in the application, each of which is believed to be in condition for allowance. Reexamination and reconsideration in light of the present Amendment and the following remarks are respectfully requested.

Claim to Priority

Acknowledgement of the proper receipt of the certified copies of the priority documents in connection with Applicant's claim to priority under 35 U.S.C. § 119(a)-(d) is noted with appreciation.

Specification & Abstract

The specification has been reviewed to correct minor matters of form and syntax in the specification as filed. The Abstract has additionally been amended per the examiner's request to set forth the same in a single paragraph. Entry of these changes, involving minor matters not involving new matter, is respectfully solicited.

Title:

At the examiner's request, Applicant proposes amending the Title of the present invention to read: "POWER SAVING DATA STORAGE CIRCUIT, DATA WRITING METHOD IN THE SAME, AND DATA STORAGE DEVICE." If, however, the examiner feels the proposed Title fails to aptly describe the invention to which the claims are directed, the examiner may amend as necessary.

Information Disclosure Statement

The Office Action noted that the Information Disclosure Statement filed on August 24, 2004 fails to comply with 37 C.F.R. 1.98(a)(3). Moreover, the Office Action noted that the International Search Report was insufficient to meet the requirements of 37 C.F.R. 1.98. Accordingly, English translations of the references cited in the August 24, 2004 Information Disclosure Statement and of the International Search Report are provided herewith.

New Claims

Support for new claims 8-13 can be found variously throughout the specification, including, for example, FIGS. 2 and 4. Since each of these new claims is clearly distinguishable from the applied art of record, allowance of the same is courteously solicited.

Claim Rejections- 35 U.S.C. § 112

In the Action, claim 2 was rejected under 35 U.S.C. § 112, second paragraph, for alleged indefiniteness. Claim 2 has been canceled. Thus, this rejection is moot. In as much the new language of claim 1 mirrors that of original claim 2, claim 1 clarifies that "said existing data and said new data are compared with each other in said comparison section in accordance with **said write control signal**." Withdrawal of this rejection is therefore courteously solicited.

Claim Rejections- 35 U.S.C. § 102

In the Action, claims 1-7 were rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,412,402 to Searby et al. ("Searby"). This rejection is respectfully traversed.
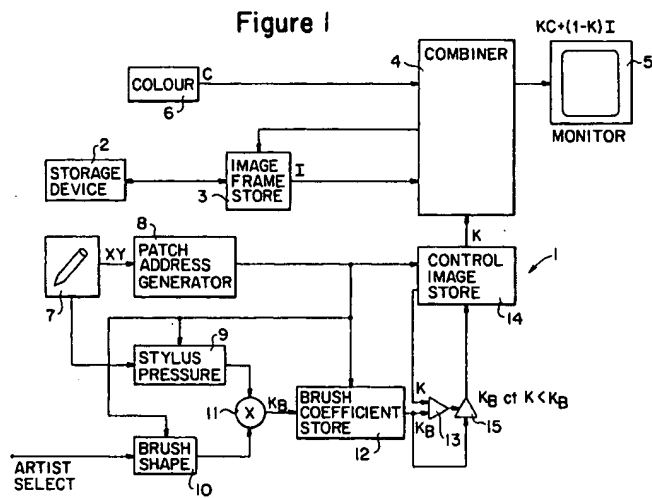
Searby

Searby discloses an electronic graphic system for use in the painting of an image. The graphic system of Searby separates data representing drawings from data representing an original image until a satisfactory result has been observed in a preview derived from the separate data. As seen in Fig. 1, an initial image is stored in a bulk storage device 2 (e.g., a Sony digital video tape recorder) and an image framestore 3. Image data I is read continuously and non-destructively by a combiner 4.

The system also includes a stylus/touch tablet 7 by which the user can paint into the image displayed on the monitor 5. A control image store 14 is used to store data representing a distribution of coefficients K. Control image data K is read from the image store 14 and input into a comparator 13

Figure 1

and compared with data K_B from a brush coefficient store 12. This is the only comparison that Searby mentions. The comparator 13 outputs a signal dependent upon the relationship between K and K_B. The output of comparator 13 is used to control gate 15, and comparator 13 and gate 15 are arranged such that gate 15 only connects the output from the brush coefficient store 12 to the control image store 14 when the value of a brush coefficient pixel K_B is greater than that of the corresponding control image pixel.

Like the image data from image framestore 3, control image data K is read continuously and non-destructively by the combiner 4. The reading of the control image store 14 and of the image framestore 3 is synchronized and the combiner 4 operates on a pixel-by-pixel basis to combine image data I with user selected color data

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C in a linear interpolation under the control of the control data K.   The resulting data from this operation is defined by the expression: $KC + (1 - K)I$ and the resulting data can be viewed on the monitor 5.   Thus, the combiner 4 does not compare control data K and image data I, but control data K is used in the linear interpolation of image data I and color data C.   Once the artist is satisfied with the alterations defined by the data $KC + (1 - K)I$, the altered data is written back into image framestore 3 and the data control image store 14 is reset to a zero value.

Claim 1

Claim 1 reads as follows:

A data storage circuit characterized by providing a comparison section for reading out existing data stored in a storage element to compare said existing data and new data with each other prior to writing of said new data to said storage element, and configuring so that, in said comparison section, in a case where said existing data and said new data are identical with each other, the writing to said storage element is not performed, and in a case where said existing data and said new data are not identical with each other, said new data is written to said storage element; and

characterized by providing **a control signal generating section** for generating **a readout control signal** for performing readout control of said existing data and **a write control signal** for performing write control of said new data, and by configuring so that said **existing data** and said **new data** are compared with each other in said comparison section **in accordance with said write control signal** from said control signal generating section.

In contrast, Searby fails to disclose, teach, or suggest a control signal generating section as recited in claim 1.   According to claim 1, the control signal generation section is for "generating a readout control signal … and a write control signal."   The readout control

signal is "for performing readout control of said existing data." The write control

signal is "for performing write control of said new data," and the "existing data and said

new data are compared ... in the comparison section in accordance with said write

control signal."

In discussing the control signal generating section, the Office Action broadly

cites to combiner 4 of Searby. However, Searby does not disclose that combiner 4 has

the features of a control signal generating section according to claim 1. Searby does

not disclose that combiner 4 generates a readout control signal. Rather, Searby

discloses that image data in the framestore 3 is read continuously and non-destructively

by combiner 4, and not that combiner 4 generates a readout <u>control</u> signal for performing

<u>readout control</u> of the existing data. *See* col. 6, lines 3-4 of Searby.

Moreover, Searby does not disclose that combiner 4 generates a write control

signal as set forth in claim 1. The closest thing Searby teaches to a write control signal

is that combined image data is written back to the image framestore 3 once the artist is

satisfied. *See* col. 7, line 66, to col. 8, line 10. However, Searby fails to disclose that

combiner 4 generates a write control signal such that existing data and new data are

compared with each other **in accordance with the write control signal**.

Additionally, in discussing the comparison section, the Office Action also

broadly cites to combiner 4. However, combiner 4 does not perform a comparison as

recited in claim 1. According to Searby, combiner 4 combines image data I with user

selected color data C in a linear interpolation under the control of control data K.

Combiner 4 is not configured such that, <u>in combiner 4</u>, "in a case where said existing

data and said new data are identical with each other, the writing to said storage element

is not performed, and in a case where said existing data and said new data are not

identical with each other, said new data is written to said storage element." In

discussing this comparison feature, the Office Action cites to col. 7, lines 34-38.

However, this part of Searby discusses comparator 13 and gate 15—not combiner 4. In

fact, the only comparison Searby mentions is comparing control image data K and brush

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coefficient K$_B$ with comparator 13.

Even though Searby mentions comparing control image data K and brush coefficient K$_B$, Searby does not disclose a control signal generating section, according to claim 1, in conjunction with comparator 13. Searby does not disclose that a control signal generating section is configured "so that said existing data and said new data are compared with each other" by comparator 13, "in accordance with said write control signal from said control signal generating section" as recited in claim 1.

Accordingly, because Searby fails to disclose, teach or suggest each and every limitation of claim 1, a *prima facie* anticipation rejection has not been established, and withdrawal of this rejection is respectfully requested. *See, e.g., Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987) ("A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference").

Claim 3

Claim 3 reads as follows:

A data writing method in a data storage circuit, characterized by:

performing a readout process of existing data stored in a storage element prior to performing a write process of new data to said storage element to compare said existing data and said new data with each other, so as not to perform the write process to said storage element, in a case where said existing data and said new data are identical with each other, and so as to perform the write process of said new data to said storage element in a case where said existing data and said new data are not identical with each other; and

characterized by **generating a readout control signal and a write control signal in accordance with a write signal input to said data storage circuit**; reading out said existing data in accordance with

said readout control signal; and comparing said existing data with said

new data in accordance with said write control signal.

In contrast, Searby fails to disclose generating a readout control signal and a write

control signal in accordance with a write signal input to said data storage circuit.   The

Office Action alleges that image data I is a readout control signal.   However, Searby

clearly teaches that "I" is image data—not a control signal for reading out existing data.

Thus, the Office Action fails to point to any portion of Searby where it teaches a readout

control signal.

Moreover, although Searby discloses a stylus/touch tablet 7 by which the user

can paint into the image displayed on the monitor 5, Searby fails to disclose **generating**

a readout control signal and a write control signal **in accordance with a write signal**

input to said data storage circuit.   Searby teaches that an XY signal is generated by the

touch tablet 7 and the XY signal is output to a patch address generator 8.   However,

Searby is silent as to generating a readout control signal and a write control signal in

accordance with the XY signal as required by claim 3.   In fact, as previously mentioned,

Searby fails to disclose a readout control signal, and the alleged write control signal of

the Office Action (middle signal of combiner 4) is not generated by the signal XY.

Accordingly, because Searby fails to disclose, teach or suggest each and every

limitation of claim 3, a *prima facie* anticipation rejection has not been established, and

withdrawal of this rejection is respectfully requested.

Claims 5 and 7

For reasons essentially similar to those discussed with respect to claim 1,

Searby fails to disclose a control signal generating section and its accompanying features.

Accordingly, a *prima facie* case of anticipation has not been established with respect to

claim 5, and withdrawal of this rejection is courteously solicited.

Moreover, aside from the novel limitations recited therein, claim 7, being

dependent either directly or indirectly upon allowable base claim 5, is also allowable at

least by virtue of its dependency upon allowable claim 5.   Withdrawal of the rejection
of claim 7 is therefore courteously solicited.

Conclusion

For at least the foregoing reasons, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the examiner is respectfully requested to pass this application to issue. If the examiner has any comments or suggestions that could place this application in even better form, the examiner is invited to telephone the undersigned attorney at the below-listed number.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 18-0013, under Order No. SON-2624 from which the undersigned is authorized to draw.

Dated: November 27, 2006

Respectfully submitted,

By_____

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